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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	Nos. CR 12-00465 DLJ
)	
Plaintiff,)	STIPULATION AND []
)	ORDER TO CONTINUE STATUS
v.)	APPEARANCE AND EXCLUDE TIME
)	FROM JANUARY 10, 2013 TO
RAQUEL RAMIREZ,)	FEBRUARY 7, 2013
)	
Defendant.)	

Raquel Ramirez is scheduled to appear before this Court on Thursday, January 10, 2013 for a further status. The parties are in active settlement discussions, and expect the matter to resolve short of trial. The parties jointly request additional time from the Court to allow the defense to review discovery, and to further work to resolve the case. The parties request to appear before this Court on February 7, 2013 at 9:00 a.m. for a further status and likely change of plea. The parties also jointly request that time be excluded under the Speedy Trial Act for adequate preparation and continuity of counsel. 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

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STIPULATION

1 Dated: January 8, 2013

Respectfully submitted,

2 MELINDA HAAG
3 United States Attorney

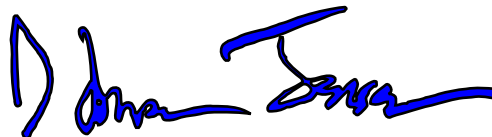
4 /s/
5 DANIEL R. KALEBA
6 Assistant United States Attorney

7 Dated: January 8, 2013

8 /s/
9 JULES BONJOUR
10 Attorney for Raquel Ramirez

11 Based upon the representation of counsel and for good cause shown, the Court grants the
12 requested continuance and finds that failing to exclude the time between January 10, 2013 and
13 February 7, 2013 would unreasonably deny the defendant continuity of counsel and would deny
14 counsel the reasonable time necessary for effective preparation, taking into account the exercise
15 of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice
16 served by excluding the time between January 10, 2013 and February 7, 2013 from computation
17 under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy
18 trial. Therefore, IT IS HEREBY ORDERED that the time between January 10, 2013 and
19 February 7, 2013 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. §
20 3161(h)(7)(A) and (B)(iv).

21
22 FJH
23 Dated: _____

24 
25 HON. D. LOWELL JENSEN
26 United States District Judge
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